

**HARTMANN DOHERTY
ROSA BERMAN & BULBULIA**
Limited Liability Partnership Attorneys At Law

433 Hackensack Avenue, Ste. 1002
Hackensack, New Jersey 07601
t: 201.441.9056
f: 201.441.9435
www.hdrbb.com

New York Office
1270 Avenue of the Americas, Ste. 816
New York, New York 10020
t: 212.344.4619

Short Hills Office
830 Morris Turnpike, Ste. 304
Short Hills, New Jersey 07078
t: 973.467.1325

Rockland Office
2 Executive Boulevard, Ste. 300
Suffern, New York 10901
t: 845.357.7900

Miami Office
8821 SW 69th Court
Miami, Florida 33156
t: 305.419.2936

July 25, 2024

VIA ECF

Honorable Michael A. Hammer
United States Magistrate Judge
50 Walnut Street
Newark, New Jersey 07101

**Re: *Agdal v. Danis*
Civil No. 23-16873 (MCA)(MAH)**

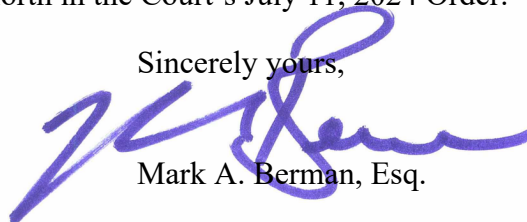
Dear Judge Hammer:

I am sending this letter in response to Plaintiff's July 23, 2024 letter complaining that they have not yet received a response to their July 18, 2024 letter listing the discovery they claim remains outstanding, and demanding that the Court enter a new order setting new deadlines and scheduling an in-person conference. Under the Court's July 11, 2024 Order, Defendant's response to Plaintiff's letter is due August 18, 2024. Thus, Defendant is not in violation of the Court's Order. For that reason, the Court should ignore Plaintiff's letter.

Indeed, I would have ignored it, too, but for the fact that I was surprised to see that Plaintiff's counsel included in their letter a paraphrase of an off-the-record remark I made to them as professional colleagues, which was not intended for public consumption. That is not how I treat my adversaries and, but for the fact that the letter was signed by Mr. Shumofsky in his role as local counsel (as he was not present during the referenced conversation), I would say that New Jersey attorneys generally do not treat their colleagues that way. Regardless, lesson learned.

With respect to timing: Presently, I am scheduled to meet with my client in my office on August 6, 2024, and I expect that I will have a response to Plaintiffs no later than August 18, 2024, in full compliance with the deadlines set forth in the Court's July 11, 2024 Order.

Sincerely yours,



Mark A. Berman, Esq.

cc: All Counsel (via ECF)